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March 10, 2020

Client/Matter No. 20115/2

Via email & CM/ECF
Hon. Vincent F. Papalia, U.S.B.J.
50 Walnut Street
Newark, NJ 07102
Courtroom 3B

Re: In re William J. Focazio
Case#: 19-10880
Hearing Date: 3/17/2020 at 10:00 AM

Your Honor:

This office represents Creditor, Allstate New Jersey Property and Casualty Insurance Company and related entities (collectively “*Allstate*”) in the above-captioned matter. Allstate is in receipt of the US Trustee’s motion to convert case to Chapter 7 (the “*Motion*”) [Dkt 140]. Reference is also made to the Adversary Proceeding Amended Complaint (20-01004 [Dkt 3]) and the allegations raised against the Debtor in the Amended Complaint. Based upon the arguments set forth in the US Trustee’s motion and those allegations against the Debtor in the Amended Complaint, Allstate hereby requests the Conversion of the Case to Chapter 7. The creditors of the estate, including Allstate, would be best served by the appointment of a Chapter 7 Trustee to investigate the assets and liabilities of the Debtor.

Respectfully Submitted,

/s/ Donald F. Campbell, Jr.

Donald F. Campbell, Jr.

DFC/djr
cc: US Trustee (via CM/ECF)
Debtor’s Counsel (via CM/ECF & Reg. Mail)

Docs #4220889-v1